



DHMH EnvHealth -DHMH- <dhmh.envhealth@maryland.gov>

## Tanning Beds

1 message

bha@neurologycenter.com <bha@neurologycenter.com>

To: dhmh.envhealth@maryland.gov

Wed, May 22, 2013 at 11:15 AM

Brian Avin  
President  
MedChi  
66 Silver Moon Drive  
Silver Spring, MD 20904-1249

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Brian H. Avin  
301-204-3925  
President  
MedChi



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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**Strengthen Maryland's Indoor Tanning Parental Consent Form**1 message

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**Lynn Bickley** <bickleymd@baybroadband.net>

Fri, May 31, 2013 at 10:16 PM

Reply-To: Lynn Bickley &lt;bickleymd@baybroadband.net&gt;

To: dhhm.envhealth@maryland.gov

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

As a dermatologist who has had to excise melanomas from a 15 year-old and 16 year-old girls, I feel strongly that minors should not be allowed in tanning beds at all. Adults can make their own foolish mistakes once they are fully informed of the dangers, but there is no reason to allow minors to use tanning beds. The widely available artificial tanning spray-on or rub-on products that produce a realistic cosmetic result should be promoted instead of indoor radiation for those to whom a tanned look is important.

Strengthening the indoor tanning consent form is a first step toward





DHMH EnvHealth -DHMH- <dhmh.envhealth@maryland.gov>

## Tanning Beds

1 message

**cosmetic.surgery@verizon.net** <cosmetic.surgery@verizon.net>

Wed, May 22, 2013 at 1:15 PM

To: dhmh.envhealth@maryland.gov

James Chappell  
Personal  
Personal  
528 Heavytrees Lane  
Severna Park, MD 21146-1022

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

James Chappell  
Personal  
Personal



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## Strengthen Maryland's Indoor Tanning Parental Consent Form

Inbox x Tanning Comments x

**Bonnie Epstein** epsteinb21@gmail.com via mta-c3poo

May 31 (3 days ago)

to me

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

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-

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.

Sincerely,





DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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## Tanning Beds

1 message

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**mdpsychpartners@verizon.net** <mdpsychpartners@verizon.net>

To: dhhm.envhealth@maryland.gov

Wed, May 22, 2013 at 12:00 PM

Andrew Feinberg  
1104 Kenilworth Drive  
Towson, MD 21204-2101

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Andrew Feinberg  
410-825-6666



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Tanning Comments

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-please prohibit minors in Maryland from using indoor tanning. I have seen countless cases of skin cancers, including melanomas in people who used indoor tanning as teenagers. Many minors and their parents do not understand the long-term serious risks associated with indoor tanning in young people. Thank you for your consideration. Sincerely, Walter J. Giblin, M.D. (dermatologist)

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.

Sincerely,

Dr. Walter Giblin  
11301 Farmland Dr  
North Bethesda, MD 20852-4523  
.....





**LAWRENCE J. GREEN, M.D., LLC**  
DIPLOMATE, AMERICAN BOARD OF DERMATOLOGY  
15005 SHADY GROVE ROAD • SUITE 440 • ROCKVILLE, MARYLAND 20850  
301-610-0663 • FAX 301-610-5420  
www.DrLawrenceGreen.com

June 6, 2013

Ms. Nancy Servatius  
Maryland Department of Health and Mental Hygiene  
Environmental Health Bureau  
201 West Preston Street, Third Floor  
Baltimore, MD 21201

**RE: Modifications to Indoor Tanning Device Consent Form**

Dear Ms. Servatius:

Thank you for the opportunity to respond to Secretary of Health and Mental Hygiene Joshua Sharfstein's request for comments on modifying the parental consent form concerning indoor tanning. I greatly appreciate that the new draft consent form has moved in the direction favored by MedChi, including stronger language regarding risk, required presentation of a governmental ID, and limitation of the time period for which a consent form is effective. Despite these changes, I believe the forms should be strengthened even more due to the serious consequences that result from using indoor tanning beds. I urge the Department of Health and Mental Hygiene ("Department") to adopt the suggestions below in order to protect Maryland's youths.

As a practicing dermatologist in Rockville, I am keenly aware of the harmful effects of indoor tanning on Maryland adults and youths. I cannot tell you how many times per month I see a 20-40 year old young woman on whom I have just found skin cancer, an atypical mole, or even a melanoma, point to teenage tanning at tanning salons as the root cause for their abnormalities. They always wish they had the wisdom/life experience they have now as an adult, but unfortunately, this is coming too late.

For the reasons detailed below, I propose that the Department tightens the regulations and existing parental consent form to 1) require a parent or legal guardian to be present to sign a **new** consent form **at every tanning session for 16-18 year olds**; (not just to initial an already signed consent form) and 2) add MORE language than has been proposed that provides more explicit education to the parent as to the serious consequences of indoor tanning. Thus, I propose the written consent form shall contain, at a minimum, the following language in bold and larger font than the existing form:

"I understand that the World Health Organization has classified the ultraviolet radiation used in tanning facilities as a Class 1 carcinogen, the same cancer risk category as tobacco products. By exposing my child to ultraviolet radiation in this tanning facility, the possibility of my child developing melanoma (skin cancer) will increase. Scientific studies have shown that even occasional use of tanning beds as a teenager significantly increases someone's risk of developing



**LAWRENCE J. GREEN, M.D., LLC**  
DIPLOMATE, AMERICAN BOARD OF DERMATOLOGY  
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301-610-0663 • FAX 301-610-5420  
[www.DrLawrenceGreen.com](http://www.DrLawrenceGreen.com)

melanoma (the deadliest form of skin cancer) by 75%. I understand there are other alternatives to ultraviolet radiation tanning booths to create a tanned look, such as tanning creams and spray tanning. *I understand that that there is no such thing as a safe tan."*

These requirements would be similar to legislation that was enacted last year in Rhode Island<sup>1</sup> and to the U.S. FDA's proposal to alert users that tanning beds are not recommended for people at all under the age of 18.

Sincerely,

Lawrence J Green, M.D.  
Assistant Clinical Professor Department of Dermatology  
George Washington University  
15005 Shady Grove Rd. #440  
Rockville, MD 20850

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<sup>1</sup> <http://www.rilin.state.ri.us/BillText/BillText12/HouseText12/H7825A.pdf>





DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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## Tanning bed regulations

1 message

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**Hugh Hill** <legmed@aol.com>

Thu, May 23, 2013 at 3:27 PM

To: dhhm.envhealth@maryland.gov

Thank you for taking this important step to protect Maryland's children and future. Please consider strengthening the regulation by making it clearer that the parent must sign in person at the premises.

Hugh F. Hill III, MD, JD, FACEP



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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**Tanning Beds**

1 message

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**mheine2@jhmi.edu** <mheine2@jhmi.edu>

Wed, May 22, 2013 at 11:25 AM

To: dhhm.envhealth@maryland.gov

Margaret Heine  
6702 Broadview Rd  
Baltimore, MD 21209-1602

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Dear Ms. Servatius,

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Margaret Heine, MD





DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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## Tanning Beds

1 message

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**drhollywood@goeaston.net** <drhollywood@goeaston.net>

Wed, May 22, 2013 at 12:15 PM

To: dhhm.envhealth@maryland.gov

Jennifer Hollywood  
538 Cynwood Drive, Suite 2  
Easton, MD 21601-3887

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Jennifer Hollywood  
410-763-8999



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

## Strengthen Maryland's Indoor Tanning Parental Consent Form

1 message

**Chesahna Kindred** <chesahna.kindred@medstar.net>  
 Reply-To: Chesahna Kindred <chesahna.kindred@medstar.net>  
 To: dhhm.envhealth@maryland.gov

Fri, May 31, 2013 at 2:16 PM

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

-100% of my patients with skin cancers are in their 20% used tanning beds during their teens. This is quite a young age of onset for skin cancer.

- Patients who sunbathed with baby oil and other sun tanning products in their teens, 20's and 30's tend to develop skin cancer in their 50's or later.

There is something to be said for the accelerated development of skin cancer in those who use tanning beds in their teens versus other forms of tanning.

- Although there is no safe method for tanning, we should ban the use ✓





DHMH EnvHealth -DHMH- <dhhm.envhealth@maryland.gov>

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## Strengthen Maryland's Indoor Tanning Parental Consent Form

1 message

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**Stephen Krivda** <sjkrivda@gmail.com>  
Reply-To: Stephen Krivda <sjkrivda@gmail.com>  
To: dhmh.envhealth@maryland.gov

Fri, May 31, 2013 at 8:16 PM

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

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- Really indoor tanning for minors should be totally banned - like smoking!

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.



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panalo@aol.com

May 24 (4 days ago)

to me

Pauline Manalo  
Alliance to MedChi  
5502 Hayloft Ct  
Frederick, MD 21703-6989

May 24, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Pauline Manalo  
301-473-7833  
Alliance to MedChi





DHMH EnvHealth -DHMH- <dhmh.envhealth@maryland.gov>

---

## Strengthen Maryland's Indoor Tanning Parental Consent Form

1 message

**Gayle Masri-Fridling** <gayle.masrifridling@gmail.com>  
Reply-To: Gayle Masri-Fridling <gayle.masrifridling@gmail.com>  
To: dhmh.envhealth@maryland.gov

Fri, May 31, 2013 at 10:16 PM

May 31, 2013

Secretary Joshua Sharfstein

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-

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Thank you in advance for your support of this critical public health issue.

Sincerely,





DHMH EnvHealth -DHMH- <dhhm.envhealth@maryland.gov>

---

## Strengthen Maryland's Indoor Tanning Parental Consent Form

1 message

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**Marsha McNeely** <dr.c.mcneely@gmail.com>  
Reply-To: Marsha McNeely <dr.c.mcneely@gmail.com>  
To: dhhm.envhealth@maryland.gov

Fri, May 31, 2013 at 9:16 PM

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

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Sincerely,



DHMH EnvHealth -DHMH- <dhhm.envhealth@maryland.gov>

## Tanning Beds

1 message

**michael.niehoff@medstar.net** <michael.niehoff@medstar.net>

To: dhhm.envhealth@maryland.gov

Wed, May 22, 2013 at 11:00 AM

J. Michael Niehoff  
9101 Franklin Square Dr - 205  
Baltimore, MD 21237-3975

May 22, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

J. Michael Niehoff, MD  
443-777-2008



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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## Tanning Beds

1 message

---

**michael.niehoff@medstar.net** <michael.niehoff@medstar.net>

Tue, Jun 4, 2013 at 11:09 PM

To: dhhm.envhealth@maryland.gov

J. Michael Niehoff  
9101 Franklin Square Dr - 205  
Baltimore, MD 21237-3975

June 4, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

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Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

J. Michael Niehoff  
443-777-2008





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## Strengthen Maryland's Indoor Tanning Parental Consent Form

Inbox x Tanning Comments x

**Michael Radowsky** radowsky@comcast.net via mta-c

May 31 (3 days ago)

to me

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

-

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.

Sincerely,

June 12, 2013

Maryland Department of Health & Mental Hygiene  
Nancy Servatis  
201 W. Preston Street, Third Floor  
Baltimore, MD 21201

Sent via Email [dhmh.envhealth@maryland.gov](mailto:dhmh.envhealth@maryland.gov)

RE: Proposed Regulation on Tanning Beds

Dear Ms. Servatis:

The Maryland State Medical Society (MedChi) was founded in 1799 by an act of the General Assembly and, since that time, has been actively involved in Maryland public health issues. We believe that this proposal is one that will materially improve the public health of Maryland. It is important to provide appropriate warnings, particularly to parents of teenage girls who more frequently patronize tanning salons.

In an ideal world, MedChi would support a complete ban on tanning salons as there is no useful benefit derived from indoor tanning and, indeed, as the medical literature indicates, only harmful effects (bibliography attached). In the absence of a prohibition, MedChi believes detailed consent forms are necessary prior to the use of tanning beds.

The proposed form is a material improvement over the current consent form. First, it clearly delineates one harmful health effect (e.g., cancer) which results from tanning bed use.

Second, MedChi believes that the provision that a parent renew their consent to a minor's use of tanning beds is a important improvement over the present system but believes that a consent should only be good for one month (as opposed to the proposed six months). Even a one month window may allow frequent tanners to use tanning beds up to 30 times.

The General Assembly, in enacting Health General Article §20-106 (the parental consent law), not only gave the Secretary authority to carry out the Section, but also specifically provided that the act did not preempt more stringent laws by a county or municipal government.

Since the Secretary has explicit authority to detail the contents and timing of the consent form, MedChi believes that he should exercise it in order to more adequately protect children who frequent tanning facilities.

Third, MedChi believes that any verbal warning should be accompanied by pictorial representations of the skin cancers which may result from tanning bed use. As has been learned from other public health campaigns, pictorial images are more effective than written warnings.



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# American Academy of Pediatrics

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## Maryland Chapter

June 12, 2013

Maryland Department of Health and Mental Hygiene  
201 W. Preston St., Third Floor  
Baltimore, MD 21201  
Attention: Nancy Servatis  
dhmh.envhealth@maryland.gov

### RE: Request for Comments on the **Proposed Revised Consent Form to Authorize Minor Use of Tanning Devices**

Dear Ms. Servatis:

The Maryland Chapter of the American Academy of Pediatrics (MDAAP) wishes to register its support for the Department's proposed revisions to the Consent Form that authorizes a minor's use of tanning devices. While MDAAP strongly supports a complete ban on tanning bed use by minors, it understands that efforts in that regard have not been successful. However, absent passage of a law to ban its use, the current consent form is inadequate to properly educate minors and their parents on the risks associated with tanning devices. The proposed consent form significantly improves the effective use of the consent form as a tool to educate parents and minors about the substantial risks involved and enhance the likelihood that there is thoughtful deliberation before accessing services.

Ultraviolet radiation (UV) from tanning beds has been classified as a known human carcinogen by the US Department of Health and Human Services (HHS). The Centers for Disease Control and Prevention's Healthy People 2020 goals include an objective to reduce adolescent use of indoor tanning devices. The World Health Organization recognizes tanning as "carcinogenic to humans" in the same category as tobacco smoking, mustard gas and asbestos. There is no ambiguity in the science. Use of indoor tanning has been linked to numerous cancers, including melanoma, the deadliest form of cancer and the second most common form for adolescents and young adults.

Despite the known risks associated with indoor tanning, use of these tanning facilities by adolescents is growing. Therefore, the State's effort to strengthen the current consent form is particularly timely. As previously urged by MDAAP, the proposed form clearly identifies risks of tanning. The form also requires parents to definitively select how long the consent form is valid with a maximum six month timeframe. The requirement to renew consent will provide additional opportunities to educate the parent and hopefully discourage further consent. MDAAP would, however, urge that the form require authorization for every session or at a minimum the authorization should be no longer than 1 month. Even a month enables a minor who is a frequent tanner access to a significant number of sessions – six months authorization is excessive and greatly enhances the risks.

MDAAP will continue to support the ongoing effort to ban indoor tanning for minors. Until such time as that objective is accomplished, we believe the recommended changes to the current consent form provide needed and appropriate strengthening of the protections afforded under current law.

**Maryland Chapter,  
American Academy of  
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1211 Cathedral Street  
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Fax: 410-727-5967  
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Third, MedChi believes that any verbal warning should be accompanied by pictorial representations of the skin cancers which may result from tanning bed use. As has been learned from other public health campaigns, pictorial images are more effective than written warnings.



MedChi supports the Proposed Regulation as a material improvement over the present consent form. However, it believes that its suggested changes will result in a more effective and informative consent form to that being proposed.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene M. Ransom, III", with a stylized flourish at the end.

Gene M. Ransom, III  
Chief Executive Officer

Enclosure

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## Strengthen Maryland's Indoor Tanning Parental Consent Form

Inbox x Tanning Comments x



**Lisa Renfro** renfrosnow@yahoo.com via mta-c3poolc  
to me

12:53 PM (1 hour ago)

Jun 3, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.

Sincerely,





DHMH EnvHealth -DHMH- <dhmh.envhealth@maryland.gov>

## Strengthen Maryland's Indoor Tanning Parental Consent Form

1 message

**Elisabeth Richard** <ericha16@jhmi.edu>  
Reply-To: Elisabeth Richard <ericha16@jhmi.edu>  
To: dhmh.envhealth@maryland.gov

Sat, Jun 1, 2013 at 8:18 AM

Jun 1, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

-This is a critical issue and minors need to be limited in their access to this known carcinogen. Think of your children and their safety.

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.

Thank you in advance for your support of this critical public health issue.



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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**Strengthen Maryland's Indoor Tanning Parental Consent Form**1 message

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**Saif Syed** <saifusyed@gmail.com>

Fri, May 31, 2013 at 5:16 PM

Reply-To: Saif Syed &lt;saifusyed@gmail.com&gt;

To: dhhm.envhealth@maryland.gov

May 31, 2013

Secretary Joshua Sharfstein

Dear Secretary Sharfstein,

As a member of the Maryland Dermatologic Society, I appreciate your support for modifying the current consent form that parents of minors must sign before their child can use an indoor tanning salon.

I applaud these efforts as a first step toward protecting minors; however, there is a need for an even stronger and more effective consent form due to the countless scientific studies that have shown clear and compelling evidence that use of indoor tanning devices represents a significant and avoidable risk factor for the development of both melanoma and non-melanoma skin cancers. Furthermore, the U.S. Department of Health and Human Services and the World Health Organization have recognized the carcinogenic risks associated with tanning bed use.

Recent scientific studies show a disturbing trend there is a steady rise in the number of young women diagnosed with melanoma, the deadliest form of skin cancer, and at more advanced stages. It is not coincidental that this demographic is also significantly more likely to use tanning beds than their male counterparts.

In order to strengthen the new draft, I urge you to include stronger language regarding risk and to require the consent form to be executed prior to each tanning bed session. Currently, the consent form is effective until the minor turns 18. Other modifications would include establishing a registry of consents, providing a recommended schedule of skin cancer screening for users of tanning beds, and images of melanomas and skin aging.

I personally have had numerous female patients who have multiple severely atypical moles and early melanomas on areas that were exposed in tanning bed sessions started during the teenage years. In the best case scenario these patients end up with leathery freckled skin with irregular scars crisscrossing their backs; in the worst case it is a premature death sentence.

Strengthening the indoor tanning consent form is a first step toward protecting minors from indoor tanning. I urge you to adopt the recommended modifications above.





DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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**Tanning Beds**

1 message

**drbtyim@yahoo.com** <drbtyim@yahoo.com>

Thu, May 23, 2013 at 1:01 AM

To: dhhm.envhealth@maryland.gov

Robert Yim  
AMA FACP  
107 Deep Dale Drive  
Timonium, MD 21093-3008

May 23, 2013

Nancy Servatius  
Environmental Health Bureau  
201 West Preston Street  
Third Floor  
Baltimore, MD 21201

Dear Ms. Servatius:

Please strengthen the regulations requiring consent by parents before minors can use tanning beds. There is increasing and irrefutable evidence that use of artificial tanning mechanisms creates an elevated risk of skin cancer (see, e.g., <http://www.bmj.com/content/345/bmj.e4757>), particularly among youthful users. I urge you to take all steps within your authority to discourage the use of tanning devices by young people and to ensure that they and their parents are fully informed about the risks of these devices. Although we applaud the most recent DHMH draft, we continue to advocate for the following modifications: ♦ Consent forms should be required to include graphic information demonstrating the risk posed by tanning devices, including imagery showing melanoma and other skin cancers and prematurely aged skin. ♦ Requiring a consent form to be executed prior to each tanning bed session, rather than allowing one consent form to be effective until the minor turns 18.

Please continue your efforts to ensure that Maryland's young people receive the maximum protection possible.

Sincerely,

Robert E Yim, M.D.  
410-252-2977  
AMA FACP



DHMH EnvHealth -DHMH- &lt;dhhm.envhealth@maryland.gov&gt;

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**Tanning Salons - Consent form**

1 message

**Jeff Zellmer** <jzellmer@mdra.org>

Wed, Jun 12, 2013 at 2:24 PM

To: dhhm.envhealth@maryland.gov

Ms. Nancy Servatius

Maryland Department of Health and Mental Hygiene

Environmental Health Bureau

201 West Preston, 3<sup>rd</sup> Floor

Baltimore, MD 21201

Dear Ms. Servatius:

I am writing you to object to the Department circumventing the legislative process on the above referenced issue. Back in 2008 the General Assembly of Maryland enacted Section 20-106 of the Health General Article. All stakeholders agreed but subsequently the past couple of session new legislation was introduced which as you are well aware it was rejected,

I would urge you to drop this plan to circumvent the legislative process. Thank you for your consideration of my request.

Respectfully,

*Hon. Jeffrie Zellmer***Vice President Government & Community Affairs**